

FILED IN OPEN COURT

JUL 26 2023

ADA

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION

CHARLES R. DIARD, JR.
CLERK

UNITED STATES OF AMERICA

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CRIM. NO. 2:23-142-TFM

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USAO NO. 23R00284

*

v.

*

VIOLATIONS: 18 USC § 922(a)(6)

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18 USC § 922(x)(1)(A)

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KADIJAH ANDRANIKA DILLARD

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INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

FALSE STATEMENT DURING PURCHASE OF A FIREARM
Title 18, United States Code, Section 922(a)(6)

On or about September 1, 2022, in the Southern District of Alabama, Northern Division,
the defendant,

KADIJAH ANDRANIKA DILLARD,

in connection with the acquisition of a firearm, an American Tactical (ATI), Omni Hybrid, 5.56mm semi-automatic pistol, serial number: NS357304, from Roundtree Outdoors, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Roundtree Outdoors, which statement was intended and likely to deceive Roundtree Outdoors, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented that she was the actual buyer of the listed firearm, whereas in truth and in fact, she purchased the firearm for another person.

In violation of Title 18, United States Code, Section 922(a)(6) and 924(a)(2).

COUNT TWO
FALSE STATEMENT DURING PURCHASE OF A FIREARM
Title 18, United States Code, Section 922(a)(6)

On or about January 4, 2023, in the Southern District of Alabama, Northern Division, the defendant,

KADIJAH ANDRANIKA DILLARD,

in connection with the acquisition of a firearm, a Taurus, model G3C, 9mm semi-automatic pistol, serial number: ADB009617, from Roundtree Outdoors, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Roundtree Outdoors, which statement was intended and likely to deceive Roundtree Outdoors, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented that she was the actual buyer of the listed firearm, whereas in truth and in fact, she purchased the firearm for another person.

In violation of Title 18, United States Code, Section 922(a)(6) and 924(a)(2).

COUNT THREE
SALE, DELIVER OR OTHERWISE TRANSFER OF A FIREARM TO A JUVENILE
Title 18, United States Code, Section 922(x)(1)

On or about May 11, 2021, in the Southern District of Alabama, Northern Division, the defendant,

KADIJAH ANDRANIKA DILLARD,

knowingly sold, delivered, or transferred a handgun, a Taurus, G3C, 9mm semi-automatic pistol, serial number: ABM214614, to Domonic W., knowing and having reasonable cause to believe that Domonic W. was a juvenile, in that he had not attained eighteen years of age.

In violation of Title 18, United States Code, Section 922(x)(1)(A) and 924(a)(6)(B)(i).

COUNT FOUR
SALE, DELIVER OR OTHERWISE TRANSFER OF A FIREARM TO A JUVENILE
Title 18, United States Code, Section 922(x)(1)

On or about September 1, 2022, in the Southern District of Alabama, Northern Division,
the defendant,

KADIJAH ANDRANIKA DILLARD,

knowingly sold, delivered, or transferred a handgun, an American Tactical (ATI), Omni Hybrid,
5.56mm semi-automatic pistol, serial number: NS357304, to Domonic W., knowing and having
reasonable cause to believe that Domonic W. was a juvenile, in that he had not attained eighteen
years of age.

In violation of Title 18, United States Code, Section 922(x)(1)(A) and 924(a)(6)(B)(i).

A TRUE BILL

FOREPERSON UNITED STATES GRAND JURY
SOUTHERN DISTRICT OF ALABAMA

SEAN P. COSTELLO
UNITED STATES ATTORNEY


ANDREW D. ARRINGTON
Assistant United States Attorney


SEAN P. COSTELLO
United States Attorney

JULY 2023